

# EXHIBIT A

**Form A****Plaintiff or Filing Attorney Information:**Name Margaret A. Norton

NJ Attorney ID Number \_\_\_\_\_

Address 505 Elizabeth Ave, Apt 2ENewark, NJ 07112iluveumar@yahoo.comTelephone Number (862)763-6249

Superior Court of New Jersey

Law \_\_\_\_\_ Division ess County \_\_\_\_\_

Part \_\_\_\_\_

Docket No: L-74-22  
(to be filled in by the court)Margaret A. Norton,  
Plaintiff,

v.

Mylan,  
Defendant(s).

Civil Action

**Complaint**Plaintiff, Margaret A. Norton, residing at  
(your name)505 Elizabeth Ave, Apt 2E, City of Newark  
(your address) (your city or town)County of Essex  
(your county)

State Of New Jersey, complaining of defendant, states as follows:

1. On August 10, 2016, Mylan, Defendant  
(name of person being sued)

(Summarize what happened that resulted in your claim against the defendant. Use additional pages if necessary.)

**Fraud - Omission**Mylan committed a fraud upon the plaintiff, through the omission of a presently existing or past material fact that sulfites were contained in the Geritol liquid High potency B-Vitamins & iron liquid supplement product.The defendant in this action resides at 1000 Mylan Boulevard, Canonsburg, PA 15317,  
(defendant's address)In the County of \_\_\_\_\_, State of New Jersey.  
(name of county where defendant lives)

2. Plaintiff is entitled to relief from defendant under the above facts.

## Form A

3. The harm that occurred as a result of defendant's acts include: (list each item of damage and injury)

1. Severe Allergic Reaction (Shortness of Breath and Wheezing)

2.

3.

Wherefore, plaintiff requests judgment against defendant for damages, together with attorney's fees, if applicable, costs of suit, and any other relief as the court may deem proper.

Dated: 12/29/2021

Signature:

Margaret A. Norton

### CERTIFICATION OF NO OTHER ACTIONS

I certify that the dispute about which I am suing is not the subject of any other action pending in any other court or a pending arbitration proceeding to the best of my knowledge and belief. Also, to the best of my knowledge and belief no other action or arbitration proceeding is contemplated. Further, other than the parties set forth in this complaint, I know of no other parties that should be made a part of this lawsuit. In addition, I recognize my continuing obligation to file and serve on all parties and the court an amended certification if there is a change in the facts stated in this original certification.

Dated: 12/29/2021

Signature:

Margaret A. Norton

**OPTIONAL:** If you would like to have a judge decide your case, do not include the following paragraph in your complaint. If you would prefer to have a jury to decide your case, please sign your name after the following paragraph.

### JURY DEMAND

The plaintiff demands trial by a jury on all of the triable issues of this complaint, pursuant to New Jersey Court Rules 1:8-2(b) and 4:35-1(a).

Dated: \_\_\_\_\_

Signature: \_\_\_\_\_

Margaret A. Norton  
505 Elizabeth Ave, Apt 2E  
Newark, NJ 07112  
862-763-6249  
iluveumar@yahoo.com

**SUPERIOR COURT OF NEW JERSEY**

**ESSEX COUNTY, LAW DIVISION**

MARGARET A. NORTON,

Case No.: Number

Plaintiff, Pro Se

vs.

**ADDITIONAL PAGES**

MYLAN,

Defendant

December 29, 2021 Margaret A. Norton, Pro Se Plaintiff

**JURISDICTION**

The Superior Court of New Jersey, Law Division Essex County, has jurisdiction over the Defendant because the cause of action occurred in the state where the case is being filed.

**STATUE OF LIMITATIONS**

New Jersey has a six year statue of limitations for fraud. N.J.S.A. 2A: 14-1

The claim accrues on the date of the act or omission that gives rise to the fraud claim, or the date on which the act or omission reasonably should have been discovered. Southern Cross Overseas Agencies, Inc. V. Wah Kwong Shipping Group Ltd., 181 F. 3d 410, 413 (3<sup>rd</sup> Cir. 1999)

In this case the date of the act that gives rise to the claim occurred on August 10, 2016 in which is within the statue of limitations.

Additionally, in this case the date the cause of the injury that gives rise to the claim of fraud was discovered on October 21, 2019 in which is within the statue of limitations also.

ADDITIONAL PAGES - 1

## SUMMARY OF THE CASE

On August 10, 2016 plaintiff purchased the Geritol liquid High potency B-Vitamins & iron liquid supplement product made by the defendant (Mylan). Plaintiff did not see any sulfites listed on the product so she purchased the product. Upon arriving home, plaintiff took the dosage as prescribed on the package. Immediately plaintiff suffered severe shortness of breath and wheezing. Plaintiff was struggling to breathe and shortly afterwards plaintiff was in full respiratory failure and at the last minute plaintiff's air came back by the grace of GOD.

Plaintiff was completely traumatized by the incident. Looking back plaintiff should have gone to the emergency room because sulfites are extremely dangerous and the symptoms could have come back, in other words she was not out of danger. Eventually plaintiff went to her Primary Care Physician on October 21, 2019 to tell him about the severe allergic reaction (Shortness of Breath and Wheezing) (Anaphylaxis) incident from the Geritol liquid High potency B-Vitamins & iron liquid supplement product that occurred on August 10, 2016. Plaintiff's doctor gave her a prescription for an Epi-pen to safe guard herself in an allergic emergency.

Upon filling the prescription on October 21, 2019 plaintiff noticed that the Epi-pen was also made by the defendant (Mylan).

There was also a pharmacy insert with a statement about sulfites but no sulfites were disclosed on the Mylan Epi-pen packaging.

It was on the day of October 21, 2019 that plaintiff discovered the cause of her injury from the defendant's Geritol liquid High potency B-Vitamins & iron liquid supplement product that

**SUMMARY OF THE CASE**

On August 10, 2016 plaintiff purchased the Geritol liquid High potency B-Vitamins & iron liquid supplement product made by the defendant (Mylan). Plaintiff did not see any sulfites listed on the product so she purchased the product. Upon arriving home, plaintiff took the dosage as prescribed on the package. Immediately plaintiff suffered severe shortness of breath and wheezing. Plaintiff was struggling to breathe and shortly afterwards plaintiff was in full respiratory failure and at the last minute plaintiff's air came back by the grace of GOD. Plaintiff was completely traumatized by the incident. Looking back plaintiff should have gone to the emergency room because sulfites are extremely dangerous and the symptoms could have come back, in other words she was not out of danger. Eventually plaintiff went to her Primary Care Physician on October 21, 2019 to tell him about the severe allergic reaction (Shortness of Breath and Wheezing) (Anaphylaxis) incident from the Geritol liquid High potency B-Vitamins & iron liquid supplement product that occurred on August 10, 2016. Plaintiff's doctor gave her a prescription for an Epi-pen to safe guard herself in an allergic emergency.

Upon filling the prescription on October 21, 2019 plaintiff noticed that the Epi-pen was also made by the defendant (Mylan).

There was also a pharmacy insert with a statement about sulfites but no sulfites were disclosed on the Mylan Epi-pen packaging.

It was on the day of October 21, 2019 that plaintiff discovered the cause of her injury from the defendant's Geritol liquid High potency B-Vitamins & iron liquid supplement product that

1 occurred on August 10, 2016.

2 The evidence of the Mylan Epi-pen and the pharmacy insert show a pattern of fraudulent  
3 omissions by the defendant (Mylan) concerning sulfites, the defendant had committed the  
4 same omission of a material fact that sulfites were contained in the Epi-pen, as the defendant  
5 committed with Geritol liquid High potency B-Vitamins & iron liquid supplement product that  
6 caused plaintiffs' injury on August 10, 2016.  
7

8  
9 **COUNT I**

10 **Defendant Committed Fraud by Omission**

11 In New Jersey, the elements of Common Law Fraud are; "(1) a material  
12 misrepresentation of a presently existing or past fact; (2) knowledge or belief by the  
13 defendant of its falsity; (3) an intention that the other person rely on it; (4)  
14 reasonable reliance thereon by the other person, and (5) resulting damages."

15 Gennari v. Weichert Co. Realtors, 691 A.2d 350, 148 N.J. 582, 610 (N.J. 1997)  
16

17 **(1) A MATERIAL MISREPRESENTATION OF AN EXISTING OR PAST FACT**  
18

19 On August 10, 2016 the defendant committed a fraud upon the plaintiff, through the omission  
20 of a presently existing or past material fact that sulfites were contained in the Geritol liquid

21 High potency B-Vitamins & iron liquid supplement product. (see Exhibit A)  
22

23 Defendant's omission was an indirect representation in which such facts does not exist.

24 Defendant's indirect representation is equal to a false representation.

25 Sulfites cause severe allergic reactions.

26 Defendant had a moral obligation to disclose the sulfites in good faith.  
27

1 The New Jersey Supreme Court has described fraud as one gaining an undue advantage  
2 through the means of an act or omission that is either "unconscientious or a violation of good  
3 faith." Jewish Ctr. of Sussex County v. Whale, 86 N.J. 619, 624 (1981).

4  
5 **(2) KNOWLEDGE OR BELIEF BY THE DEFENDANT OF ITS FALSITY**

6 Defendant (Mylan) knowingly and intentionally committed a fraud upon the plaintiff, through  
7 the omission of a presently existing or past material fact that sulfites were contained in the  
8 Geritol liquid High potency B-Vitamins & iron liquid supplement product.

9  
10 Attached Evidence shows defendant Mylan's pattern of behavior concerning fraudulent  
11 omissions of the presence of sulfites in their products. (see Exhibit B)

12  
13 On October 21, 2019 three years after the incident plaintiff discovered the cause of her  
14 injury from the defendant's Geritol liquid High potency B-Vitamins & iron liquid supplement  
15 product that occurred on August 10, 2016.

16  
17 On October 21, 2019 plaintiff filled her prescription for an Epi-pen auto-injector and  
18 discovered the manufacturer of the product is the defendant (Mylan).

19 The Epi-pen came with a pharmacy insert that contains a statement that reads:  
20 "If you are allergic to sulfites, talk to your doctor. Some products have sulfites".  
21  
22 The statement words were used as an act suggesting an omission, the words were used to  
23 suggest something that was never said on the defendant's Epi-pen product label.

24 The statement was made on the pharmacy insert for the defendant's Epi-pen on October 21,  
25 2019 to the plaintiff. (see Exhibit B)

26  
27 The defendant had committed the same fraudulent omission of a presently existing or past  
28



1 material fact that sulfites were contained in the defendant's Epi-pen product, as the defendant  
2 committed with their Geritol liquid High potency B-Vitamins & iron liquid supplement product  
3 that caused plaintiff's severe allergic reaction.  
4

5 Sulfites cause severe allergic reactions as indicated on the pharmacy insert.

6 Evidence shows that the defendant Mylan has pattern of behavior concerning fraudulent  
7 omissions of the presence of sulfites in their products that were unknown to the plaintiff.  
8

9 Defendant (Mylan) had substantial knowledge of the presence of sulfites in the Geritol liquid  
10 High potency B-Vitamins & iron liquid supplement product that were unknown to the plaintiff,  
11 and the defendant (Mylan) was aware of the dangerous risk the sulfites pose to the plaintiff.  
12

13 Defendant having the knowledge that the sulfites pose extreme danger to the plaintiff, had a  
14 duty to disclose the sulfites in good faith, as the defendant had an unfair advantage over the  
15 plaintiff.

16 The New Jersey Supreme Court has described fraud as one gaining an undue advantage  
17 through the means of an act or omission that is either "unconscientious or a violation of good  
18 faith." Jewish Ctr. of Sussex County v. Whale, 86 N.J. 619, 624 (1981).  
19

20 **Additional Evidence of defendant's knowledge of belief if it's falsity**

21 Defendant (Mylan) had a huge financial interest in using sulfites in the Geritol liquid High  
22 potency B-Vitamins & iron liquid supplement product, and omitting the material fact of its  
23 existence from the plaintiff.  
24

25 Sulfites cause severe allergic reactions.

26 Mylan's Epi-pen is a device made to stop severe allergic reactions.  
27

1 Mylan stood to profit immensely from both products.

2 **Exhibit C** shows that defendant (Mylan's) Epi-pen price increased by 500% in May 2016 the  
3 same year as plaintiff's severe allergic reaction to Mylan's Geritol liquid High  
4 potency B-Vitamins & iron liquid supplement product in which occurred in 2016.  
5

6 **3) AN INTENTION THAT THE OTHER PERSON RELY ON IT**

7 Defendant's omission of the material fact that sulfites were included in the Geritol liquid High  
8 potency B-Vitamins & iron liquid supplement product, was intended to induce the plaintiff to  
9 believe the product did not contain sulfites, and therefore, plaintiff would buy and consume  
10 the product.  
11

12 Plaintiff believed the defendants indirect representation that the Geritol liquid High potency B-  
13 Vitamins & iron liquid product did not contain sulfites, and therefore, plaintiff brought and  
14 consumed the product.  
15

16 **4) REASONABLE RELIANCE THEREON BY THE OTHER PERSON**

17 Plaintiff had no way of discovering the omission of the material fact that sulfites were  
18 contained in the Geritol liquid High potency B-Vitamins & iron liquid supplement product.  
19

20 Without the sulfites being listed on the product label, plaintiff had no other way of knowing it  
21 was contained in the product.  
22

23 Plaintiff acted just like any other reasonable person in the same situation would have acted.

24 Plaintiff did not see any sulfites listed on the package therefore, she purchased and consumed  
25 the product.  
26

1       **(5) DAMAGES**

2       As a result of the defendant's omission of a material fact that sulfites were contained in the  
3       Geritol liquid High potency B-Vitamins & iron liquid supplement product, plaintiff suffered  
4       damages as follows;  
5

6       **(A) Severe Allergic Reaction (Shortness of Breath and Wheezing)**

7                       **RELIEF SOUGHT**

8       Wherefore, Plaintiff demands judgment against the defendant, as follows;  
9

- 10       1. For injury damages in the amount of 3 million dollars;  
11       2. For punitive damages in an amount that is fair and just;  
12       3. For such other and further relief as the court deems equitable and fit.  
13

14  
15       December 21, 2021



16                       Margaret A. Norton  
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1       **(5) DAMAGES**

2       As a result of the defendant's fraudulent omission of a material fact that sulfites were  
3  
4       contained in the Geritol liquid High potency B-Vitamins & iron liquid supplement product,  
5       plaintiff suffered damages as follows;

6       (A) Severe Allergic Reaction (Shortness of Breath and Wheezing) (see **Exhibit D**)

7                       **RELIEF SOUGHT**

8  
9       Wherefore, Plaintiff demands judgment against the defendant, as follows;

- 10       1. For injury damages in the amount of 3 million dollars;
- 11       2. For punitive damages in an amount that is fair and just;
- 12
- 13       3. For such other and further relief as the court deems equitable and fit.

14  
15       December 29, 2021



16                       Margaret A. Norton

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**EXHIBIT “A”**

# GERITOL<sup>®</sup>

liquid



Energy Support

High potency  
B-Vitamins & iron  
liquid supplement

12 FL OZ (354 mL)

# GERITOL<sup>®</sup>

liquid



Energy Support

High potency B-Vitamins  
& iron liquid supplement

12 FL OZ (354 mL)

# GERITOL<sup>®</sup>

liquid



Energy Support

High potency  
B-Vitamins & iron  
liquid supplement

12 FL OZ (354 mL)

## Supplement Facts

Serving Size: 1/2 fl. oz. (1 Tablespoon)  
Servings Per Container: 24

Amount Per 1/2 fl. oz.	% Daily Value
<b>Calories</b> 28	
<b>Sugars</b> 7g	
Thiamine (Vitamin B1) 2.5 mg	170%
Riboflavin (Vitamin B2) 2.5 mg	150%
Niacin 50 mg	250%
Vitamin B6 0.5 mg	25%
Pantothenic Acid 2 mg	20%
Iron 18 mg	100%
Methionine 25 mg	*
Choline Bitartrate 50 mg	*

\* Daily Values not established.

**Ingredients:** Invert Sugar, Purified Water, Alcohol 12%, Brewers' Yeast, Ferric Ammonium Citrate, Caramel Color, Choline Bitartrate, Nicotinamide, Citric Acid, dl-Methionine, Thiamine HCl, Riboflavin, d-Panthenol, Flavors, Benzoic Acid, Sodium Hydroxide, Pyridoxine HCl. Contains: Soy

**Directions:** Use dosage cup enclosed. Shake well before using. Adults 12 years and older: 1 tablespoon (1/2 fl. oz.) daily after a meal, or as directed by a doctor. Not intended for children under 12.

**WARNING:** Accidental overdose of iron-containing products is a leading cause of fatal poisoning in children under 6. Keep this product out of reach of children. In case of accidental overdose, call a doctor or poison control center immediately.

\* This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Do not store above 25°C (77°F). Protect from freezing.

Questions or comments?

Call toll-free 1-855-874-0970 weekdays between 8:30AM and 5:00PM EST.

GERITOL<sup>®</sup> is a registered trademark of Meda AB.

Distributed by:

Meda

Somerset, NJ 08873

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**TAPE-REMOVABLE FEATURE: DO NOT USE IF PRINTED NECK BAND ON BOTTLE IS MISSING OR BROKEN.**

www.geritol.com





About 24,800,000 results (0.67 seconds)

<https://www.mylan.com>

## Mylan - Seeing Is Believing

Mylan is now part of Viatris, a new global healthcare company committed to empowering people to live healthier at every stage of life.

### Investor Relations

Mylan is now part of Viatris, a new global healthcare company ...

### News Archive

Mylan Announces Appointment of Experienced Pharmaceutical ...

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**Mylan**

Pharmaceutical  
Industry company



Mylan N.V. was a global generic and specialty pharmaceuticals company. In November 2020, Mylan merged with Upjohn, Pfizer's off-patent medicine division, to form Viatris. Wikipedia

#### Customer service email:

[customer.service@mylan.com](mailto:customer.service@mylan.com)

#### Stock price: VTRS (NASDAQ)

\$13.07 +0.31 (+2.43%)

Dec 21 2:04 PM EST - Disclaimer

**Customer service:** 1 (800) 796-9526

**Headquarters:** Canonsburg, PA

**Founded:** 1961, White Sulphur Springs, WV

**Subsidiaries:** Meda AB, Mylan Epd, Lic., Alphapharm, MORE

**Parent organization:** Viatris

**Founders:** Milan Puskar, Don Panoz

Board of directors

Brand

Price target

Ceo compensation

[Disclaimer](#)

## People also ask

What drugs is Mylan?

What is Mylan known for?

Is Mylan owned by Pfizer?

Is Mylan a generic brand?

[Feedback](#)

## Mylan



Hours

**A Mylan Inc.**  
New York, NY · In Grand Central · 42 St · (917) 262-2950

[Website](#) [Directions](#)

**B Mylan Specialty**  
Basking Ridge, NJ · (908) 542-1999

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Skin Condition Treatments



Ferro Grad C Iron  
with Vitamin C 30  
(242)



Mylan 2 x Endwards  
Original Wart  
(25)

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**EXHIBIT “B”**



**NO**

973-877-3641

**RX# 6113732-0216**

216 SHOPRITE OF NEWARK  
206 SPRINGFIELD AVENUE  
NEWARK, NJ 07103

10/21/2019



**NORTON, MARGARET**

**DOB: 01/28/1967**

**505 ELIZABETH AVE 2-E NEWARK, NJ 07112**

**862-215-8390**

**Date Filled: 10/21/2019**

TP: UHC COMMUNITY PLAN OF NJ

AUTH: 192914026211023997

**EPINEPHRINE 0.3MG/0.3ML SOAJ**

**NDC#49502-0102-02**

**QTY: 2**

**DAYS: 30**

**WILLIS, RUDOLPH**

**COPAY: \$0.00**

**NO REFILLS**

A note from your Pharmacist:



**NEW**

\*G\*

**Thank you for filling all your prescription  
needs at ShopRite Pharmacy where  
Caring is our Business.**

9961137320000021600263200000000010

RX#6113732N- 0216

Filed on: 10/21/19

NORTON, MARGARET

IDENTIFICATION: Solution

MEDICATION: EPINEPHRINE 0.3MG/0.3ML SOAJ

GENERIC NAME: Epinephrine Auto-Injector and Prefilled Syringe

Brand Name: EpiPen Symjepi Twinject

GENERIC NAME: Epinephrine Auto-Injector and Prefilled Syringe

Pronunciation: (ep i NEF rin)

Brand Name: EpiPen Symjepi Twinject

**Warning:**

**What is this drug used for?:** - It is used to treat a very bad allergic response.  
 - It may be given to you for other reasons. Talk with the doctor.

**What do I need to tell my doctor BEFORE I take this drug?:** - If you are allergic to this drug; any part of this drug; or any other drugs, foods, or substances. Tell your doctor about the allergy and what signs you had.  
 This is not a list of all drugs or health problems that interact with this drug.  
 Tell your doctor and pharmacist about all of your drugs (prescription or OTC, natural products, vitamins) and health problems. You must check to make sure that it is safe for you to take this drug with all of your drugs and health problems. Do not start, stop, or change the dose of any drug without checking with your doctor.

**What are some things I need to know or do while I take this drug?:** - Tell all of your health care providers that you take this drug. This includes your doctors, nurses, pharmacists, and dentists.  
 - Do not give into the fingers, hands, or feet. Doing so may lead to lower blood flow in these areas. If this drug is given on accident, get medical help right away.  
 - If you are allergic to sulfites, talk with your doctor. Some products have sulfites.  
 - If you have high blood sugar (diabetes), you will need to watch your blood sugar closely.  
 - If you are 65 or older, use this drug with care. You could have more side effects.  
 - Tell your doctor if you are pregnant, plan on getting pregnant, or are breast-feeding. You will need to talk about the benefits and risks to you and the baby.

**How is this drug best taken?:** Use this drug as ordered by your doctor. Read all information given to you. Follow all instructions closely.

- It is given as a shot into a muscle or into the fatty part of the skin.
  - Be sure you know how to use before an emergency happens. Read the package insert and instructions for use that come with this drug. If you have any questions about how to use this drug, talk with the doctor or pharmacist.
  - Keep this drug with you at all times. You may want to keep extra ones at work, school, and home.
  - Someone else may have to give this drug. Be sure others know where this drug is stored and how to give it if needed.
  - Never put your fingers or hand over the tip.
  - Check the device before you need to use it to make sure the safety release is in place and that the device can be removed from the case. Do not take off the safety release until ready to use.
  - When you are ready to use, take the pen out of the case.
  - Hold pen with tip down.
  - Make a fist around the pen.
  - Pull off safety release. Throw away the safety release right after using this drug.
  - Jab straight into the outer thigh as you have been told. This drug may be given through clothes if needed. Inject and hold for as long as you were told.
  - Do not give into the buttocks.
  - If giving this drug to your child, hold the leg still to prevent injury. Try to limit how much your child moves before and during an injection.
  - Get medical help right away after using this drug.
  - Put back in the storage case.
  - Take it with you to the hospital.
  - Do not use this drug if the solution changes color, is cloudy, or has particles. Get a new one.
  - Do not use if this drug is out of date. Get a new one.
  - If the device has been activated by accident, do not use it for an emergency. Replace the device with a new one.
- What do I do if I miss a dose?**

- Get medical help right away.



## **EXHIBIT “C”**

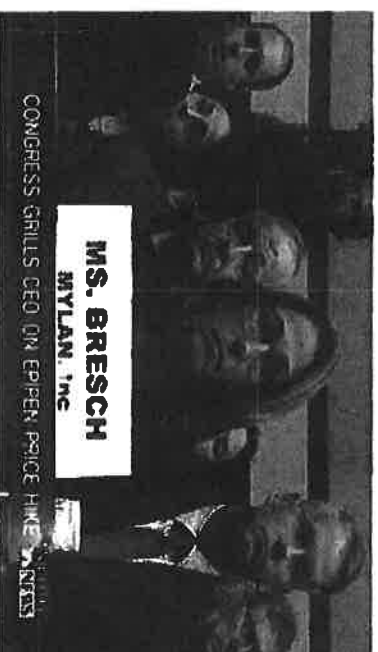


# Mylan's EpiPen Pricing Scandal

September 14, 2017

By: Andreas Kanaris Miyashiro

Each year about 3.6 million Americans are prescribed EpiPen, the epinephrine auto-injector. The EpiPen is a life-saving treatment for anaphylactic reactions, which are caused by allergens such as nuts, seafood, and insect bites. A sharp increase in EpiPen's price between 2009 and 2016 caused outrage, and prompted debate over whether Mylan N.Y, the owner of EpiPen, acted unethically. Beyond the behaviour of Mylan, EpiPen's price increases raise questions about the conditions of the US pharmaceutical market, and whether existing regulations and laws are sufficient to protect consumers.

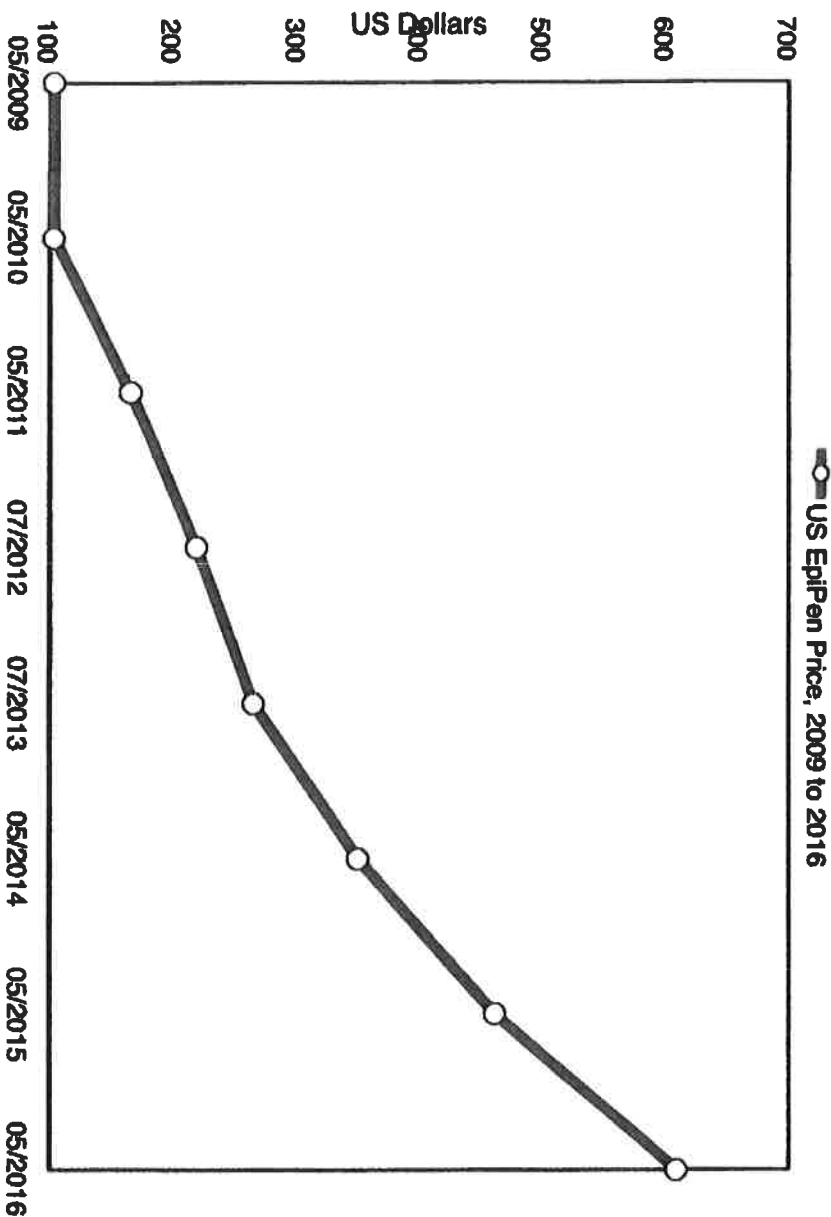


## EpiPen Price Increases



SEVEN  
PILLARS  
INSTITUTE  
FOR LIBERAL, FAITHFUL, AND FREE

Mylan N.V. acquired the right to market EpiPen as part of its acquisition of Merck KgaA. In 2009, Mylan began to steadily increase the price of EpiPen. In 2009, the wholesale price (the price which pharmacies paid) was \$103.50 for a two-pack of autoinjectors. By July 2013 the price was up to \$264.50, and it rose a further 75 percent to \$461 by May of 2015. By May of 2016, the price rose again up to \$608.61. Over a seven year period, the price of EpiPen had risen about 500% in total.



# EXHIBIT “D”





# IRVINGTON EMERGENT CARE AND REHABILITATION CENTER

DBA

☐ IRVINGTON FAMILY PRACTICE    ☐ IRVINGTON SPORTS MEDICINE  
☐ IRVINGTON FAMILY MEDICINE

**Rudolph C. Willis, M.D.**  
Director  
Family Practice

**Marc D. Cadet, M.D.**  
Family Practice

**Nelson Gramatica,**  
R.N., M.S.N., APN-C

*Internal Medicine*

*Gynecology*

*Podiatrics*

*Geriatrics*

*Minor Surgery*

*Psychiatry*

*Pulmonary*

*Cardiology*

*Physical Therapy*

*Exercise Machines*

*Rehabilitation*

*X-Rays*

*VNG, Balance Testing*

*Holter*

*Stress Test*

*EMG*

*EKG*

*Echocardiogram*

*Blood Test*

*Colon Hydrotherapy*

*Weight Loss Program*

*Substance Abuse Treatment*  
*(SUBOXONE)*

To whom it may concern,

Kindly accept this letter as a notification that I attended to

Ms. Margaret Norton on October 21st of 2019 at Irvington Family  
Practice.

The reason for the visit was a routine checkup. The patient stated that she  
had a severe reaction and wanted to safeguard herself against an  
Anaphylactic Reaction. An EpiPen was prescribed for her to keep and  
carry.

Patient has mentioned that in August of 2016 she experienced a severe  
allergic reaction (wheezing and shortness of breath) after taking Geritol  
Liquid Iron Supplement.

Sincerely,

Dr. Rudolph Willis, MD